

Exhibit E

(Email Correspondence
dated December 6, 2019)



Re: Powers v. RCDRC et al, 19CV4738

Alexander Klein <aklein@barketepstein.com>

Fri, Dec 6, 2019 at 6:29 PM

To: Giovanna Mabile <gmabile@mersonlaw.com>

Cc: "Geremia, Todd R." <trgeremia@jonesday.com>, "bdavey@mmlaw.us.com" <bdavey@mmlaw.us.com>, Bruce Barket <bbarket@barketepstein.com>, Jesse Mautner <jmautner@mersonlaw.com>, "Stephens, Eric P." <epstephens@jonesday.com>

Okay, let's chat next week.

Alexander R. Klein, Esq.

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On Dec 6, 2019, at 6:21 PM, Giovanna Mabile <gmabile@mersonlaw.com> wrote:

I have confirmed with my client that he has resided in Thailand continuously since 2015, where he works and has a family.

On Fri, Dec 6, 2019 at 4:39 PM Alexander Klein <aklein@barketepstein.com> wrote:

Giovanna,

Thanks for letting us know. How was it confirmed that he is domiciled in Thailand?

Best,

Alexander R. Klein, Esq.

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On Dec 6, 2019, at 2:57 PM, Giovanna Mabile <gmabile@mersonlaw.com> wrote:

Counselors,

For jurisdiction, plaintiff is a US citizen with domicile in Thailand, so it appears per Coury v. Prot, 85 F.3d 244, 250 (5th Cir. 1996) that there is no diversity jurisdiction. Will you stip to remand the case to state court?

We will agree to the answers by the end of January.

Best,